

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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JILL DOE,	)	
	)	
	)	
<i>Plaintiff,</i>	)	
	)	
V.	)	C.A. NO. 1:11-cv-11593-DPW
	)	
ANN BRADSHAW, et al	)	
	)	
<i>Defendants.</i>	)	
	)	

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**PLAINTIFF'S REQUEST FOR LEAVE TO AMEND**  
**CONCISE STATEMENT OF MATERIAL FACTS**

Pursuant to Local Rule 7.1. (b)(3), the plaintiff, Jill Doe, respectfully requests leave of this Court to file an Amended Concise Statement of Material Facts to add and clarify citations.

This heavily litigated case involves complex factual and legal issues related to multiple constitutional, statutory and common law claims against distinct defendants. On Friday, July 31, 2015, the parties filed voluminous motions and supportive documents. On Monday, August 3, 2015, the plaintiff filed her Statement of Material Facts. The Statement was late owing to health issues impacting undersigned counsel.<sup>1</sup> On August 13, 2015, the defendant contacted the undersigned seeking a Rule 7.1 conference prior to filing a Motion to Strike, including those paragraphs of the Statement of Material Facts for which there is inadequate citation. The parties

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<sup>1</sup> Counsel was scheduled for brief medical leave on August 30, 2015, but postponed leave in order to finalize the filing of the Plaintiff's Motion for Summary Judgment without the need for a request for extension. Unfortunately, counsel was unable to provide full citations due to those circumstances. Counsel has disclosed this to opposing counsel.

have agreed to resolve said citation issues by way of this Request for Leave to Amend. This agreement will assist all parties and the Court by clarifying paragraphs for which the evidentiary basis is presently unclear.

WHEREFORE, based upon the foregoing, the plaintiffs respectfully request that this request for leave be granted.

RESPECTFULLY SUBMITTED,  
JOHN, JANE, and JILL DOE

BY: /s/ Elizabeth Knight Adams  
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**LOCAL RULE 7.1(a)(2) CERTIFICATE AND CERTIFICATE OF SERVICE**

Pursuant to Local Rule 7.1(a)(2), I certify that, on August 17, 2015 this document through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as nonregistered participants.

/s/ Elizabeth K. Adams  
Elizabeth Knight Adams